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D. Scott Martinez
(303) 295-8475
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April 30, 2010

VIA PRIORITY MAIL AND E-MAIL TO _____

CONFIDENTIAL COMMUNICATION

Federal Election Commission
Attn: Thomasenia P. Duncan
Ann Marie Terzaken
Frankie Hampton
Wanda Brown
999 E. Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
2010 MAY -3 PM 2:41
OFFICE OF GENERAL
COUNSEL

**Re: MUR: 6246 – Reply to April 14, 2010 Request for Further
Information**

Dear Ms. Duncan:

We represent Dollar Loan Center, LLC (“Dollar Loan Center” or the “Company”), as well as the personal interests of Charles Brennan, Judi Brennan, Robert Brennan, Bruce Cooley, and Carla Cooley and hereby provide their response to the above-referenced matter under review. This reply is respectfully submitted in response to your April 14, 2010 letter seeking further clarifications from the Company.

Your April 14 letter sought three clarifications: (1) a more detailed description of Holland & Hart’s internal investigation; (2) whether a reimbursement for a campaign donation was *offered* versus whether an advance payment or reimbursement was actually made; and (3) whether Holland & Hart represents the personal interests of Charles Brennan, Robert Brennan, Judi Brennan, Bruce Cooley and Carla Cooley. In response to your request for information, please see the following, as well as the attached affidavits and designation of counsel forms.

INTERNAL INVESTIGATION & REPRESENTATION OF INDIVIDUALS

As part of our internal investigation, Holland & Hart enlisted two attorneys to conduct interviews and review relevant documents. The attorneys conducted the interviews with guidance from the “Recommended Practices for Companies and Their

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Trial Lawyers' Board of Regents. At the time of the interviews, Holland & Hart represented only the Company and did not represent the individuals interviewed.

The two attorneys conducted interviews of Charles Brennan, Robert Brennan, Judi Brennan, Bruce Cooley and Carla Cooley. Each individual was interviewed separately and exhaustively. Both attorneys were present and participated in the interviews. The attorneys also reviewed relevant, but confidential, business documents and records to assist in their investigation. The documents were reviewed outside of the presence of the Company and the individuals interviewed.

The internal investigation, through witness interviews and the absence of any business documents affirmatively showing a suspect transfer of funds, showed there was no evidence Charles Brennan or Dollar Loan Center made an advance payment or reimbursement for a campaign donation; nor was there any indication that an actual advance payment or reimbursement occurred for a campaign donation.

Holland & Hart agreed to the legal representation of the aforementioned individuals for the purpose of responding to the FEC request for information only after we determined there was no evidence of any advance payments or reimbursement being offered or made; and after the FEC requested the present clarifying information. (See attached Designation of Counsel forms). We anticipate there will be no negative inference based upon our firm's representation of both the individuals and Company, as outlined in the "McNulty Memorandum." See US Department Of Justice, Principles of Federal Prosecution of Business Organizations (Jan 20, 2003) (the "Thompson Memorandum"), available at http://www.usdoj.gov/dag/cftf/business_organizations.pdf; see also *United States v. Stein*, 435 F.Supp.2d 330 (SDNY 2006).

OFFERS OF REIMBURSEMENT AND ADVANCE PAYMENT

We appreciate the opportunity to more fully explain the information contained in the previously submitted affidavits. Attached are supplemental affidavits that demonstrate that no individual offered to make an advance payment or reimbursement for a campaign contribution. Further, the affidavits also confirm that no individual made or received advance payment or reimbursement for a campaign contribution.

The disparity between counsel's cover letter and the affidavits was an inadvertent omission. In an abundance of caution, we attempted to cover every possible scenario in the current set of affidavits. To be clear, based upon our interviews and reflected in the affidavits, no payments were offered, made, or received in connection with a donation to Mr. Porter's congressional campaign. If there was any ambiguity in the previous communication, we hope to clear that ambiguity with the attached affidavits.

If we can be of assistance or provide any further clarification, please do not hesitate to contact us.

Respectfully,


D. Scott Martinez, Esq.
for Holland & Hart LLP

DSM

cc: Dollar Loan Center
Charles Brennan
Bruce Cooley
Judi Brennan
Robert Brennan
Carla Cooley

Enclosures:

Designation of Counsel for Charles Brennan
Designation of Counsel for Bruce Cooley
Designation of Counsel for Judi Brennan
Designation of Counsel for Robert Brennan
Designation of Counsel for Carla Cooley

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-CONFIDENTIAL COMMUNICATION-

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FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

Statement of Designation of Counsel
(Respondent/Witness)

MUR: 6246

Name of Counsel: D. Scott Martinez

Firm: Holland and Hart LLP

555 17th St., Suite 3200 Denver, CO 80202

Telephone: (303) 295-8475

Fax: (303) 291-9133

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4-28-10
Date

[Signature]
Signature

Name (Print): Charles Brennan

Address: _____

Las Vegas NV 89131

Telephone: Home (_____) _____

Business (702) 493-9422

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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SSS 17th St., Suite 3200 Denver, CO 80202

Telephone: (303) 295-8475

Fax: (303) 291-9133

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4/30/10
Date

Bruce Coven
Signature

Name (Print): Bruce Coven

Address: _____

Sioux Falls, SD 57103

Telephone: Home _____

Business (605) 373-3901

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MUR: 6246

Name of Counsel: D. Scott Martinez

Firm: Holland and Hart LLP

555 17th St., Suite 3200 Denver, CO 80202

Telephone: (303) 295-8475

Fax: (303) 291-9133

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4-29-10

Date

Judi Brennan
Signature

Name (Print): Judi BRENNAN

Address: _____

LAS VEGAS, NV 89143

Telephone: Home _____

Business () _____

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Washington, DC 20463

Statement of Designation of Counsel
(Respondent/Witness)

MUR: 6246

Name of Counsel: D. Scott Martinez

Firm: Holland and Hart, LLP

555 17th St., Suite 3200 Denver, CO 80202

Telephone: (303) 295-8475

Fax: (303) 291-9133

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4/29/10
Date

Robert Brennan
Signature

Name (Print): Robert Brennan

Address: _____

Las Vegas NV 89143

Telephone: Home () _____

Business () _____

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MUR: 6246

Name of Counsel: D. Scott Martinez

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555 17th St., Suite 3200 Denver, CO 80202

Telephone: (303) 295-8475

Fax: (303) 291-9133

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

4-30-10

Date

Carla Coey

Signature

Name (Print): Carla Coey

Address: _____

Sioux Falls, SD 57103

Telephone: Home (_____) _____

Business (_____) _____

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437(g)(1)(B)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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